

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

*Additional parties and counsel listed on
signature pages*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

THIS FILING RELATES TO: *Smith v. Meta
Platforms et al.*, 4:23-cv-05632

**STIPULATED PROTOCOL FOR
PLAINTIFF MEDICAL EVALUATION**

The parties, by and through their undersigned counsel, hereby stipulate and agree to the following with regard to the mental examination (“ME”) of Plaintiff Leslie Smith (“Smith”) pursuant to Federal Rule of Civil Procedure 35.

1. This Protocol governs the nature of the ME to be conducted for Plaintiff Smith.

2. The ME shall be conducted by Dr. Praveen Kambam, who is a “suitably licensed or certified examiner” under Rule 35(a).

3. The ME shall take place at the Holiday Inn Express & Suites, 3050 S. Dirksen Pkwy, Springfield, IL 62703 on July 7, 2025 at 10:30 AM CT.

4. The ME shall not last longer than three hours, not inclusive of any breaks.

1 5. The ME will be limited in scope to assessing the extent, nature, and possible cause(s) of
2 any mental or psychiatric disorders or illnesses. Dr. Kambam will only conduct psychiatric and
3 psychological evaluations of each Plaintiff and will not conduct any testing.

4 6. Neither party is entitled to videotape any portion of the ME. However, either party may
5 elect to record the examination by audio technology.

6 7. One counsel for Plaintiff may be present during the ME as an observer. An observer may
7 monitor the examination, but shall not participate in or disrupt it. Plaintiff's counsel will not discuss the
8 substance of the ME with Plaintiff during breaks. No family member or friend shall attend or be in the
9 room while the ME is in progress.

10 8. The ME will be transmitted via Zoom with an audio and visual telecast, allowing additional
11 defense experts and plaintiffs' experts and counsel to observe virtually (with cameras off). The Zoom
12 screen and the number of people in attendance will not be visible to the Plaintiff during the ME. Plaintiff's
13 face shall be visible on camera in a wide view, but the camera shall not be directly in front of her. In
14 addition, Defendants will have one attorney in attendance at the premises to handle logistical matters, and
15 will arrange for technical personnel, but they will not be present for the examination itself. Dr. Kambam
16 and the Defendants' representative handling logistics will not speak with or attempt to engage any family
17 member or friend who may accompany Plaintiff to the examination.

18 9. No family member or friend shall attend or observe the ME either in person or remotely
19 while the ME is in progress; nor shall any such individual speak with or interact with Plaintiff Smith
20 during the entirety of the ME, inclusive of any breaks.

21 10. No person other than those specifically mentioned in this stipulation shall be present in
22 person or remotely during the ME.

23 11. Defendants will provide Plaintiff's counsel with "a copy of the examiner's report, together
24 with like reports of all earlier examinations of the same condition" in accordance with the deadline for
25 Defendants' case-specific expert reports in Case Management Order No. 18. Defendants are entitled to
26 request and receive "like reports of all earlier or later examinations of the same condition" as provided by
27 the Rule. All drafts of such reports are considered privileged and need not be disclosed.

28 By stipulating to this agreement, the parties agree to abide by these protocols unless and

until the Court denies this stipulation.

IT IS SO STIPULATED AND AGREED.

DATED: July 3, 2025

Respectfully submitted,

/s/ Patrick J. Andrews

Patrick J. Andrews

Lexi J. Hazam

**LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP**

275 BATTERY STREET, 29TH FLOOR

SAN FRANCISCO, CA 94111-3339

Telephone: + 1 (415) 956-1000

Email: lhazam@lchb.com

Email: pandrews@lchb.com

Attorneys for Plaintiff

COVINGTON & BURLING LLP

/s/ Ashley M. Simonsen

Ashley M. Simonsen (State Bar No. 275203)

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: + 1 (424) 332-4800

Facsimile: +1 (650) 632-4800

Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*

Paul W. Schmidt, *pro hac vice*

David N. Sneed, *pro hac vice*

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Email: pajones@cov.com

Email: pschmidt@cov.com

Email: dsneed@cov.com

Emily Johnson Henn (State Bar. No. 269482)

COVINGTON & BURLING LLP

3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306
Telephone: + 1 (650) 632-4700
Facsimile: +1 (650) 632-4800
Email: ehenn@cov.com

*Attorney for Defendants Meta Platforms, Inc. f/k/a
Facebook, Inc.; Facebook Holdings, LLC; Facebook
Operations, LLC; Facebook Payments, Inc.;
Facebook Technologies, LLC; Instagram, LLC;
Siculus, Inc.; and Mark Elliot Zuckerberg*

KING & SPALDING LLP

/s/ Geoffrey M. Drake
Geoffrey M. Drake
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: + 1 (404) 572-4600
Facsimile: + 1 (404) 572-5100
Email: gdrake@kslaw.com

FAEGRE DRINKER LLP

/s/ Andrea Roberts Pierson
Andrea Roberts Pierson
Faegre Drinker LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

*Attorneys for Defendants TikTok Inc. and ByteDance
Inc.*

MUNGER, TOLLES & OLSEN LLP

/s/ Jonathan H. Blavin
Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor

San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300

Attorneys for Defendant Snap Inc.

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Brian M. Willen

Brian M. Willen
Wilson Sonsini Goodrich & Rosati
bwillen@wsgr.com
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899

Lauren Gallo White
Wilson Sonsini Goodrich & Rosati
lwhite@wsgr.com
Samantha A. Machock
smachock@wsgr.com
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

Christopher Chiou

Wilson Sonsini Goodrich & Rosati
cchiou@wsgr.com
633 West Fifth Street
Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: July 3, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen